



Jacob E. Lewin, Esq.  
Direct Dial: 347.378.1863  
jlewin@steinadlerlaw.com

April 29, 2022

**VIA ECF**

The Honorable Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 750  
New York, New York 10007

Re: *Surgical Specialists of Greater New York v. UMR, et al.*,  
Case No. 1:21-cv-10982 (GHW) (KHP)

**APPLICATION GRANTED**

*Katharine H. Parker*  
**Hon. Katharine H. Parker, U.S.M.J.**

Dear Judge Parker:

05/02/2022

This firm represents plaintiff Surgical Specialists of Greater New York as authorized representative of Patient J.M. in the above-referenced action. In light of the settlement conference scheduled for June 28, 2022 (Doc. 31), we write to respectfully request that the dates set forth in the current Scheduling Order (Doc. 29) be postponed until after that conference has occurred. We believe that doing so will allow for the greatest chance of resolution in this action, prior to the parties having committed substantial resources to the discovery process.

As such, we propose that the current discovery schedule be amended to adopt the following dates:

Event	Current Date	Proposed Date
<u>Deadline to amend or join additional parties</u>	<u>April 30, 2022</u>	<u>July 15, 2022</u>
<u>Completion of fact discovery</u>	<u>July 29, 2022</u>	<u>October 14, 2022</u>
<u>Completion of expert discovery</u>	<u>September 12, 2022</u>	<u>November 23, 2022</u>

This is the first request for such an extension. Defendants UMR a/k/a UMR, Inc., a division of UnitedHealthcare, and UnitedHealthcare Insurance Company consent to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s Jacob E. Lewin

Jacob E. Lewin

cc: All counsel of record (via ECF)